Atlanta Gas Light

10 Peachtree Place NE
Atlanta, GA 30309
404 584 4000tel

August 15, 2023

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, Georgia 30334

RE: Docket 4167-U: Annual Environmental Response Cost Recovery Expenses

Dear Ms. Tanner:

In accordance with the requirements of Section IV, paragraph (D) of the Settlement Agreement in the above –referenced docket, enclosed please find several schedules depicting the purpose of the Environmental Response Costs incurred by Atlanta Gas Light Company (AGLC) during the period July 1, 2021 – June 30, 2023.

We are also enclosing a brief summary of the current and projected remediation activities for the manufactured gas plant sites and an update to AGLC's tariff, pages 17 and 18, reflecting the updated Environmental Response Cost Recovery Rider rate effective October 1, 2023.

If you have any questions regarding this information, please feel free to contact me at 404-584- 4374.

Respectfully,

Gary Tucker
Manager, Regulatory Accounting & Revenue Recovery Mechanism

Enclosures

cc: All Commissioners
Nancy Tyer, Natural Gas Section
Janey Chauvet, Natural Gas Section
Tony Wackerly, Natural Gas Section
Joanne Mello, AGL
Bryan Batson, AGL
Greg Corbett, AGL

Manufactured Gas Plant Sites
Annual Update
Period Ending June 30, 2023

Atlanta Gas Light Company (AGLC) continues to move forward with the investigation and remediation of its former manufactured gas plant (MGP) sites. During this year, AGLC incurred total expenses of $1.2 M for investigation, remediation, and associated activities. Expenses incurred for legal advice and services related to environmental regulations, pursuit of potentially responsible parties, and related activities were ~$98K. The cumulative amount for recoveries from third parties, insurance carriers, and potentially responsible parties since inception is in excess of $27.3 million. During the cost year, there were no third-party recoveries from insurance or other sources. A brief narrative of the significant activities during the year, including significant historical regulatory events, is presented below, and is followed by an overview of planned activities for the next year.

Manufactured Gas Plant Sites
Past Activities
Period July 1, 2022 – June 30, 2023

Georgia Sites

Athens

- Site construction in connection with redevelopment by the property owner Athens-Clarke County (ACC) is ongoing, and Georgia Power Company (GPC) and AGLC worked with ACC and its contractors on soil or water handling and disposal as needed.
- In an email on December 14, 2022, EPD provided informal comments on the Voluntary Remediation Program (VRP) Compliance Status Report (CSR) and requested that soil and groundwater Certification of Compliance statements for the three non-VRP parcels, which were added as Qualified Parcels, be submitted for each parcel. The EPD also provided minor editorial changes to the certifications and requested that the pages be revised, signed, and resubmitted for review and approval.
- On March 31, 2023, GPC and AGLC submitted a VRP CSR Addendum letter to EPD for review and approval. The VRP CSR Addendum included the requested revised Certification of Compliance pages and information regarding the Additional Qualifying Properties for the site.
- On May 1, 2023, EPD provided a letter stating that they determined that the CSR is complete and meets the requirements of the Georgia VRP Act and they concur with the certification of compliance that the site parcels are in compliance with non-residential RRS for soil and Type 5 RRS for groundwater. Therefore, due to the updated compliance certification and the recorded UECs, the Consent Order on the Athens site was terminated, and the site was delisted.

Augusta

- In an email dated December 13, 2022, EPD provided questions regarding the Compliance Certifications included with the VRP CSR submitted by AGLC on June 1, 2021. The agency's main question was why two of the parcels sub-listed as part of the original HSI listing for the site were not listed as VRP parcels, nor included on the certification page submitted with the VRP CSR. AGLC responded on January 9, 2023 explaining that the soil on these parcels was certified in 2009 in the OU3 Canal Completion/Compliance Status Report to a non-residential RRS and the certifications were subsequently approved. AGLC further explained that groundwater was either deemed to meet residential standards based on data collected on the parcels or on surrounding ones.
- In an email dated March 21, 2023, EPD provided questions regarding the parcel designations included with the VRP CSR. The questions pertained to the draft UECs and proposed designations for the abutting parcels of those in need of a UEC. AGLC responded on May 1,

2023 with clarifications on the UEC language and adjusted parcel designations as required. As part of that response, AGLC inquired as to whether those changes could be made by email or in the form of a CSR Addendum. AGLC is awaiting further direction on the form of this submittal from EPD.

- AGLC continued to work with JLL and local officials to identify the optimal beneficial reuse of the parcels AGL owns taking into account all relevant considerations.

Brunswick

- The 2022 annual visual site reconnaissance inspection was conducted on July 28, 2022 and the report summarizing the site inspection was submitted to EPD on August 9, 2022.
- The 2023 annual site visual reconnaissance inspection was conducted on June 6, 2023.
- This site is shared with GPC and, per agreement, AGLC leads the ongoing monitoring efforts.

Griffin

- AGLC submitted the first Semiannual VRP Progress Report to update EPD on site activities since VRP approval. The letter report stated that the VRP CSR was in progress and would be submitted in late April or early May 2023.
- AGLC submitted the VRP CSR on May 3, 2023, which included a request for site closure and delisting.

Macon

- With the submittal of the VRP CSR, groundwater monitoring and Semiannual VRP Progress Reports have been discontinued. No site activities were conducted.
- The consultant for the Macon Housing Authority ("MHA"), which currently owns part of the former MGP site, contacted AGLC with a request to review the Soil Management Plan for the developer based on concerns that the EPD raised to the consultant regarding whether MHA's redevelopment project might encounter or compromise the remedy's solidified mass. On October 18, 2022, AGLC attended a meeting held on site with the MHA and its consultant, the developer, and EPD to discuss construction plans and to develop potential solutions in the event the solidified mass was encountered.
- On March 8, 2023, AGLC and GPC attended a meeting held on site with the MHA and its consultant, the developer, and EPD to discuss and observe the recent remedy impacts. The impacts were handled as discussed and agreed to in the previous site meeting with the group and as no additional excavation for the stormwater management system is anticipated, future construction issues should be minimized. The EPD was satisfied with the resolution.
- The remaining draft UECs were submitted to EPD and the property owners concurrently for review in May 2018. No comments have been received from the EPD on those UECs to date. AGLC will re-submit those, in red line, for EPD to review once any comments have been received.

Macon 2

- No field activities or further reports are expected at this site.
- As background for non-field activities in the reporting period, in 2005 AGLC and GPC entered into an Agreement Regarding Past Costs and Restrictive Covenants (the "2005 Agreement") with the Macon-Bibb County (MBC) and Macon Urban Development Authority (MUDA), current owners of the Macon 2 property. Among other things, the 2005 Agreement called for the utilities to clean up the property to nonresidential standards and to pay MBC compensation for limiting the property to nonresidential use. The 2005 Agreement also gave MBC rights to change the restrictions to include residential uses but only after returning to AGL and GPC the compensation paid for the restrictions. In late September 2019, AGLC and GPC received a package of information from an attorney for MBC and MUDA indicating that they have been actively exploring residential site development on the property. Through these communications, AGLC

and GPC learned that in May 2015 MBC and MUDA submitted an application to enter the site into the VRP. The remedial plan included conducting additional investigation to determine the extent of any further corrective action that might be needed to certify site soils to residential standards. EPD accepted the site into the VRP in 2015 and investigation and excavation activities were conducted from 2014 to 2018. A VRP CSR was submitted in November 2018, with an amendment in April 2019. In May 2019, MUDA executed a new Uniform Environmental Covenant ("UEC") that conflicted with the restrictions required by the 2005 Agreement by allowing for some residential use and listing only MBC and MUDA as "Interested Parties" while excluding AGLC and GPC. The UEC also failed to bring the existing restrictions to the attention of EPD. After notifying MBC and MUDA of these concerns, AGLC and GPC made an extensive review of the 2005 Agreement and all relevant correspondence from 2014 to date in order to develop a possible approach that would honor the 2005 Agreement while allowing MBC and MUDA to achieve their redevelopment goals. In January 2022, AGLC and GPC provided a draft term sheet to MUDA for an agreement that would replace the 2005 Agreement. On February 10, 2022, MUDA's board approved the parameters of the proposed term sheet. Therefore, all parties appear to be ready to proceed towards negotiating a definitive agreement. However, MBC and MUDA have delayed further efforts pending commitments from private development partners.

Rome

- *(Background)* The Rome MGP site was delisted from Georgia's Hazardous Site Inventory (HSI) and reclassified as a Class III site in an EPD letter dated August 10, 2015.
- On August 19, 2022, the annual site inspection was conducted, with the Annual Visual Site Reconnaissance Survey Report submitted in mid-October 2022 in accordance with the Continuing Action Monitoring Plan (CAMP).

Savannah

- *(Background)*AGLC completed the remediation of soil impacts with site restoration occurring in May 2005. Closure Reports were approved in June 2006 with a certain portion of the site with impacts remaining in places designated as a Type 5 (engineering controls) area, remaining on Georgia's HSI in perpetuity.
- Quarterly system effluent sampling and flow meter readings continued in July 2022 through June 2023.
- The results of the quarterly effluent sample collected in June 2022 and flow meter readings were submitted in a Quarterly Discharge Monitoring Report (DMR) on July 15, 2022, which included the proof of the flow meter calibration.
- Quarterly effluent sampling covering the period July through September of 2022 was conducted in September 2022. The results of this sampling and flow meter readings were submitted in a Quarterly DMR on October 15, 2022.
- The Annual Site Visual Reconnaissance Report was submitted on July 15, 2022, which also included a copy of the October 2021, January, April, and July 2022 (quarterly) DMRs.
- Quarterly effluent sampling covering the period October through December of 2022 was conducted in mid-December 2022. The results of this sampling and flow meter readings were submitted in a Quarterly DMR on January 15, 2023, which included the proof of the flow meter calibration for the second half of calendar year 2022.
- Quarterly effluent sampling covering the period January through March of 2023 was conducted in mid-March 2023. The results of this sampling and flow meter readings were submitted in a Quarterly DMR on April 15, 2023.
- Quarterly effluent sampling covering the period April through June of 2023 was conducted in early June 2023. The flow meter calibration was also conducted in June 2023.
- The annual site visual reconnaissance inspection was conducted in June, according to CAMP requirements.

Valdosta

- As the site has been delisted and the UEC has been recorded, no activities were conducted this period.

Waycross

- MNA continued as the groundwater remediation technology for alluvial groundwater, with reduced frequency of sampling of site COI and MNA parameters from semiannually to annually beginning with the March 2021 event.
- In an email dated September 26, 2022, EPD requested a copy of the previous site RRS compliance certifications and accompanying EPD approvals for the site. AGLC responded in emails dated September 22nd and 28th with all available soil certification documentation and approvals thereof.
- The annual groundwater monitoring event was conducted in mid-March and the report was submitted on May 31, 2023. AGLC reiterated the request for site closure and delisting because groundwater data is non-detect with the exception of one well and, with regard to that one well, a single low-level detection should not be considered material in light of the extensive data set confirming compliance.

Florida Sites

Orlando

OU1:

- Continued operation of the remediation system and remediation system related sampling and operation and maintenance (O&M) in accordance with the Short-Term Groundwater Monitoring Plan and approved proposed modifications to the groundwater performance monitoring program included in Table 24 of the October 2021 Semi-Annual Report (Month 7 – 12 Reporting Period). Additional adjustments were made to the operating remediation system on June 30, 2022 per the 27 April 2022 Semi-Annual Report, Year 2 Month 1-6 Reporting Period report and June 28, 2022 email correspondence with USEPA and FDEP following completion of the June 2022 O&M event.
- Quarterly sampling was performed.
- The air sparge system (primary site groundwater remediation technology for impacts outside the barrier wall) continued operations on a cycled basis. The SVE system continued operations.
- The Annual Inspection was completed by Geosyntec personnel on August 18th and corrective actions, including sealing cracks observed in the concrete portion of the engineering cap located on Parcel 7 (right of way east of Parcel 6), were completed by Geosyntec personnel on September 12th.
- Abandonment of off-site monitoring well LS-MW-15 was completed on July 1, 2022 by the Developer responsible for the relocation due to construction activities in its original location.
- The fourth OU1 Semiannual Performance Monitoring Report (Year 2 Month 7-12 Reporting Period) was prepared and submitted to USEPA and FDEP in October 2022.
- A representative of Geosyntec and AGLC met with EPA and FDEP on general, high-level OU1 and OU2 topics such as transitioning OU1 from active operations to long-term monitoring, OU2 Feasibility Study path forward, applicability of FL Chapter 62-780, etc.
- Geosyntec conducted the Year 3 Month 6 semiannual groundwater performance monitoring event, and the Y3 Month 6 Semiannual Performance Monitoring Report was submitted to USEPA and FDEP on May 1, 2023.
- Replacement of off-site monitoring well LS-MW-15 was completed in late June 2023 by the Developer responsible for the relocation due to construction activities in its original location.

OU2:

- Geosyntec completed field activities for the OU2 Push-Pull flushing study, as described in the Phase 2 Pilot Study Work Plan (PSWP), in May and is in the process of preparing a report.
- The initial baseline equilibrium push-pull testing phase of field work as planned was completed August 2022. The data obtained from the testing completed at the three trial wells (UF-MW20, UF-MW-24 and UF-MW-D) were evaluated for initial interpretation. The Group and Geosyntec provided recommendations to the USEPA and FDEP for the multi-cycle push-pull testing; testing procedures, and timeframe modifications relative to those described in the PSWP based on the baseline equilibrium push-pull testing results. Geosyntec presented initial summary of baseline testing and recommendations for further multicycle push-pull testing in a teleconference with USEPA, FDEP and Group members. The presentation of the results was well-received by EPA and FDEP.
- OU2 Upper Floridian Aquifer (UFA) wells UF-MW-29 and UF-MW-32 were installed, and aquifer characterization performed, per the PSWP.
- Geosyntec initiated recalibrating and refining the existing groundwater flow model based upon the data collected in 2020, 2021, and 2022.
- The State of Florida is requiring an easement to allow drilling and field activities on the State of Florida property for proposed UFA monitoring well locations UF-MW-30 and UF-MW-31. As an interim measure, the State of Florida was amenable to a one-year license agreement, which the Group applied for and secured. The State of Florida (Bureau of Public Lands, FDEP) and Geosyntec executed a license agreement for drilling and installing monitoring wells at two locations (proposed wells UF-MW-30 and UF-MW-31). Meanwhile, the Group has been developing the various submittals required by the State of Florida for the easement process.
- Geosyntec obtained the final right-of-way permit from the City of Orlando for the drilling and installation of an additional monitoring well location on Chatham Avenue (UF-MW-33).
- On May 1, 2023, the Group, Geosyntec, USEPA, and FDEP participated in a teleconference call to update USEPA and FDEP on the progress of groundwater flow modeling activities and the current evaluation of the multi-cycle push-pull testing data.

St. Augustine

- The Well Abandonment Report was submitted to EPA and FDEP.
- The annual groundwater monitoring event was conducted in late December and the annual groundwater monitoring report was submitted in mid-April 2023.
- Damage to well MW-30S was noted upon arrival at the site and the well was unable to be gauged or sampled; therefore, GEI prepared a Well Damage Memo and submitted that report to EPD along with the Annual Groundwater Monitoring Report.
- A contractor has been hired by the site owner to begin construction on the site.

Sanford

- The sitewide groundwater monitoring event and annual site inspection was conducted in August 2022 and the annual groundwater monitoring report was submitted in December 2022.
- Groundwater Use Advisory Zone (GUAZ) Notifications were successfully sent via certified mail to all recipients except the Christian Deliverable Outreach Ministry. GUAZ notification was hand delivered to the church on August 23, 2022.
- The recommendation to return to annual monitoring was made to USEPA and FDEP on the November 16, 2022 call; they did not disagree with the recommendation.
- USEPA accepted the Quality Assurance Project Plan as final.
- The Annual Financial Assurance Packages were prepared and submitted to EPA.

Manufactured Gas Plant Sites
Planned Activities
Period July 1, 2023 - June 30, 2024

Georgia Sites

Athens

- GPC and AGLC will continue to work with ACC and their contractors on soil handling and disposal until the construction excavation is complete.

Augusta

- The VRP CSR documenting that soil and groundwater meets the provisions of the VRP Act was submitted in June 2021, which included a request for closure and delisting. AGLC will respond to EPD's comments on the VRP CSR, as received, and will continue to work toward site closure.
- AGLC will continue to draft the Type 5 marker language and draft UECs for all of the affected parcels.
- AGLC will continue to work with JLL and local officials to identify parties interested in the developing the parcels.

Brunswick

- The Annual Visual Site Reconnaissance Inspection Report summarizing the site inspection was submitted to EPD in July 2023.
- The next annual site visual reconnaissance survey will be conducted in accordance with the CAMP in June or July 2024.

Griffin

- With the submittal of the VRP CSR, groundwater monitoring and Semiannual VRP Progress Reports have been discontinued.
- The chlorinated treatment system to address non-MGP-related impacts remains decommissioned. These impacts are likely associated with a dry cleaner (or cleaners) that formerly operated upgradient.
- AGLC will respond to comments provided by EPD on the VRP CSR, if any are received.

Macon

- With the submittal of the VRP CSR, groundwater monitoring and Semiannual VRP Progress Reports have been discontinued.
- AGLC will prepare draft UECs for the additional parcels identified in their June 4, 2022 Comment/Approval letter, respond to EPD's comments on the remaining UECs, if any, and will continue to work toward site closure.
- Site construction has been initiated and AGLC will work with the MHA and EPD on potential remedy impacts and soil handling and disposal as needed.

Macon 2

- No field activities or further reports are expected at this site.
- No activities are planned to be conducted this quarter.
- AGLC and GPC will continue to work with MBC and MUDA to coordinate revisions to the UEC and existing covenant (if required), or toward obtaining a binding agreement to replace the 2005 Agreement Regarding Past Costs and Restrictive Covenants with the City of Macon until an agreement with all parties is reached.

Rome

- In mid-August 2023, an annual visual site reconnaissance survey will be conducted in accordance with the CAMP and the report will be submitted in September 2023.

Savannah

- The groundwater interceptor system will continue to operate, including the quarterly effluent sampling and DMR submittals, until further notice from EPD.
- Quarterly system effluent sampling and flow meter readings will continue in this period.
- The results of the quarterly effluent sample covering the period April to June 2023 (June sampling) and flow meter readings collected in June 2023 will be submitted in a Quarterly DMR by July 15, 2023.
- Semiannual flow meter calibration was conducted in June 2023. The proof of calibration will be submitted with the Quarterly DMR on July 15, 2023.
- The 2023 Annual Survey Report with the annual certification of the property uses (Type 4 and Type 5 areas), CAMP monitoring form, and site photos will be submitted to the EPD by July 15, 2023. The Survey Report will also include copies of the October 2022, January 2023, April 2023, and July 2023 (quarterly) DMRs.
- The results of quarterly effluent samples covering the periods July to September 2023, October to December 2023, January to March 2024, and April to June 2024 and associated flow meter readings will be submitted in Quarterly DMRs by October 15, 2023, January 15, April 15, and July 15, 2024, respectively.
- Semiannual flow meter calibration and system repairs (as needed) will be conducted in the second half of 2023 and the first half of 2024; the calibrations are to be performed no later than the end of the months of June and December. The proof of calibration will be submitted no later than July 15th and January 15th, respectively.
- After an evaluation of site current and historical groundwater elevation data, AGLC concluded that the system does not need to be restored to full operation status (i.e., pumping wells and system repaired and operational) to be effective. In addition, since the effluent data has been below detection limits for over 10 years, AGLC plans to request no further action, as the City of Savannah has indicated in recent conversations that they would be amenable to this approach. EPD stated that it will not comment on our informal proposal for the path forward for closure unless a formal modification request is submitted. AGLC is contemplating preparing a draft CAP Modification (or similar) to request site closure or entering the site into the VRP.
- Since the groundwater pumping wells are not required to maintain groundwater levels below the groundwater interceptor wall and the system cannot be returned to full operational status (without great expense or effort), AGLC will decommission the pumping wells and remove all electrical wiring feeding into the vault and surface materials (and potentially the entire vault) in December 2023.
- AGLC will continue to coordinate with GPC site workers that need to enter the areas with a groundwater restriction.

Valdosta

- No activities are planned.

Waycross

- MNA will continue as the selected groundwater remediation technology with annual sampling in March, followed by reporting activities in May.
- If additional groundwater monitoring is required, the results of the annual groundwater monitoring event will be summarized in a report to be submitted by May 31, 2024, if closure is not granted prior to March 2024.

Florida Sites

Orlando

- Groundwater treatment systems in OU1 will be operated and monitored and operating parameters will be adjusted as needed.
- Geosyntec will continue to refine the existing groundwater flow model based upon the data collected in recent years.
- Geosyntec will continue to summarize the results from the OU2 Push-Pull flushing study, as described in the Phase 2 PSWP.
- The Group will meet with EPA to discuss OU2 pilot testing and data updates.
- The Group will mobilize to begin installation of proposed UFA monitoring well locations UF-MW-30, UF-MW-31 on State-owned property and MW-33 on City of Orlando property. Aquifer characterization may then be performed, per the PSWP.
- The Group will submit an application for an easement to secure continued access to UF-MW-30 and UF-MW-31 following the conclusion of the 1-year license agreement. The Group will continue discussions with USEPA and FDEP with the hope of submitting a Feasibility Study for OU2 in the next nine to 12 months.
- The Group will continue discussion with USEPA and FDEP with the goal of decreasing the amount of active remediation (air sparging, soil vapor extraction, and groundwater recirculation) in OU1 in the next year.

St. Augustine

- Annual groundwater sampling and reporting will continue.
- The new owner of the marina site indicated that development of the site will be reinitiated and is anticipated to begin in September 2023. AGLC will meet with the new property owner/developer to discuss the implications of the remediation on development activities.
- In order to prepare for site development, monitoring well MW-30S will be abandoned in early September since it cannot be rehabilitated. A replacement well is not currently planned.
- The new owner is seeking assistance with soil management plans as it proceeds with development. Additionally, soil management oversight by AGLC may be warranted to protect AGLC's interests in managing MGP-impacted soils appropriately.
- The Group will work with USEPA and FDEP towards a no further action agreement for groundwater at the site. AGLC and the City will be responsible for continuing obligations associated with maintenance of the institutional controls.

Sanford

- The Group will conduct the annual groundwater monitoring event and site inspection in August 2023.
- The Annual Groundwater Monitoring Report documenting the August 2023 groundwater monitoring event will be drafted and submitted to the USEPA.

Atlanta Gas Light Company
Calculation of Net Environmental Response Costs
To Be Recovered October 1, 2023 Through September 30, 2024

	Cost Year 28 7/18-6/19	Cost Year 29 7/19-6/20	Cost Year 30 7/20-6/21	Cost Year 31 7/21-6/22	Cost Year 32 7/22-6/23	Total
Total Costs	$20,455,140.72	$7,349,680.32	$1,379,006.53	$1,131,021.25	$1,187,466.94	
Amortization Period	5 Years	5 Years	5 Years	5 Years	5 Years	
Recovery Year	5	4	3	2	1	
Amount to be recovered 10/1/23 through 9/30/24 Before Deferred Tax Benefit	4,091,028.14	1,469,936.06	275,801.31	226,204.25	237,493.39	6,300,463.15
Deferred Tax Benefit (See Schedule 2)	(72,260.63)	(51,927.53)	(14,614.60)	(15,981.96)	(20,974.46)	(175,759.18)
Net Environmental Response Costs Amortization October 1, 2023 through September 30, 2024	4,018,767.51	1,418,008.53	261,186.71	210,222.29	216,518.93	6,124,703.97

Less:	Third Party Recoveries (See Schedule 5)	0.00
	Carrying Costs Accrued on Ratepayer Portion of Third Party Recoveries (See Schedule 5)	0.00
	Environmental Response Cost Balancing Adjustment (See Schedule 3)	16,940.90
	Carrying Costs Accrued on Environmental Response Cost Balancing Adjustment Twelve Months Ended 9/30/23 (See Schedule 3)	(785.85)
Amount Subject to Recovery from Ratepayers October 1, 2023 through September 30, 2024		6,108,548.92
Total Estimated Dedicated Design Day Capacity (DDDC) in Dts		2,807,422
ERC Factor per Dt of DDDC Each Year		2.18
ERC Factor per Dt of DDDC Each Month		0.1817

Atlanta Gas Light Company
Costs Incurred from July 1, 2022 through June 30, 2023

Schedule 1

Account Number	Description		Amount
18230928	Program Management Clean-Up Expense	$	570,143.91
18230929	Contractor Expense	$	242,844.25
18230930	Consultant Expense	$	276,421.50
18230931	Legal Litigation Expense	$	98,057.28
18230932	Legal Expense	$	-
18230933	Property Acquisition Settlement Expense	$	-
	Total Environmental Response Costs	$	1,187,466.94

Schedule 2

Atlanta Gas Light Company
Calculation of Deferred Tax Benefit
To Be Returned to Ratepayers

	Cost Year 28 7/18-6/19	Cost Year 29 7/19-6/20	Cost Year 30 7/20-6/21	Cost Year 31 7/21-6/22	Cost Year 32 7/22-6/23
Total Costs	20,455,140.72	7,349,680.32	1,379,006.53	1,131,021.25	1,187,466.94
X [(5-0)/ 5]					100%
X [(5-1)/ 5]				80%	
X [(5-2)/ 5]			60%		
X [(5-3)/ 5]		40%			
X [(5-4)/ 5]	20%				
	4,091,028.14	2,939,872.13	827,403.92	904,817.00	1,187,466.94
X Net Capital Cost Rate (Docket No. 42315-U Weighted After-Tax Cost of Capital)	6.98%	6.98%	6.98%	6.98%	6.98%
	285,615.13	205,247.17	57,765.20	63,169.80	82,903.00
X Effective Federal and State Income Tax Rate (See Below)	25.30%	25.30%	25.30%	25.30%	25.30%
Deferred Tax Benefit for Cost Year 28, Recovery Year 5	72,260.63				
Deferred Tax Benefit for Cost Year 29, Recovery Year 4		51,927.53			
Deferred Tax Benefit for Cost Year 30, Recovery Year 3			14,614.60		
Deferred Tax Benefit for Cost Year 31, Recovery Year 2				15,981.96	
Deferred Tax Benefit for Cost Year 32, Recovery Year 1					20,974.46
Federal Income Tax Rate [.21% X(1-.0544)]	19.86%	19.86%	19.86%	19.86%	19.86%
State Income Tax Rate	5.44%	5.44%	5.44%	5.44%	5.44%
Total Effective Federal & State Income Tax Rate	25.30%	25.30%	25.30%	25.30%	25.30%

Schedule 2

Atlanta Gas Light Company
Calculation of Deferred Tax Benefit
To Be Returned to Ratepayers

	Cost Year 27 7/17-6/18	Cost Year 28 7/18-6/19	Cost Year 29 7/19-6/20	Cost Year 30 7/20-6/21	Cost Year 31 7/21-6/22	
Total Costs	2,854,210.16	20,455,140.72	7,349,680.32	1,379,006.53	1,131,021.25	
X [(5-0)/ 5]					100%	
X [(5-1)/ 5]				80%		
X [(5-2)/ 5]			60%			
X [(5-3)/ 5]		40%				
X [(5-4)/ 5]	20%					
	570,842.03	8,182,056.29	4,409,808.19	1,103,205.22	1,131,021.25	
Amounts Oct. - Dec 2022						
X Net Capital Cost Rate	7.11%	7.11%	7.11%	7.11%	7.11%	
(Docket No. 42315-U Weighted After-Tax Cost of Capital)						
	40,564.03	581,416.92	313,360.97	78,393.76	80,370.37	
X Effective Federal and State Income Tax Rate (See Below)	25.30%	25.30%	25.30%	25.30%	25.30%	
Deferred Tax Benefit for Cost Year 27, Recovery Year 5	2,565.68					
Deferred Tax Benefit for Cost Year 28, Recovery Year 4		36,774.62				
Deferred Tax Benefit for Cost Year 29, Recovery Year 3			19,820.08			
Deferred Tax Benefit for Cost Year 30, Recovery Year 2				4,958.41		
Deferred Tax Benefit for Cost Year 31, Recovery Year 1					5,083.43	
Amount Oct. 22-Dec.22					69,202.22	
					23,067	Monthly Amount for Oct. - Dec .22
Federal Income Tax Rate [.21% X(1-.0544)]	19.86%	19.86%	19.86%	19.86%	19.86%	
State Income Tax Rate	5.44%	5.44%	5.44%	5.44%	5.44%	
Total Effective Federal & State Income Tax Rate	25.30%	25.30%	25.30%	25.30%	25.30%	
Amounts January 2023 to Present						
X Net Capital Cost Rate	6.98%	6.98%	6.98%	6.98%	6.98%	
(Docket No. 42315 Weighted After-Tax Cost of Capital)						
	39,853.34	571,230.26	307,870.76	77,020.27	78,962.25	
X Effective Federal and State Income Tax Rate (See Below)	25.30%	25.30%	25.30%	25.30%	25.30%	
Deferred Tax Benefit for Cost Year 27, Recovery Year 5	7,562.17					
Deferred Tax Benefit for Cost Year 28, Recovery Year 4		108,390.94				
Deferred Tax Benefit for Cost Year 29, Recovery Year 3			58,418.48			
Deferred Tax Benefit for Cost Year 30, Recovery Year 2				14,614.60		
Deferred Tax Benefit for Cost Year 31, Recovery Year 1					14,983.09	
Amount Jan. 23 - Sep. 23					203,969.28	
					22,663	Monthly Amount for Jan.-Sept 23
Federal Income Tax Rate [.21% X(1-.0544)]	19.86%	19.86%	19.86%	19.86%	19.86%	
State Income Tax Rate	5.44%	5.44%	5.44%	5.44%	5.44%	
Total Effective Federal & State Income Tax Rate	25.30%	25.30%	25.30%	25.30%	25.30%	

Revised Tax Benefit Calculation

Prior Year Filing - Before Cost of Capital Change	276,625.74
Prior Year Filing - After Cost of Capital Change	273,171.50
Adjustment to Prior Year Tax Benefit Calculation	**3,454.24**
Monthly from Jan. 2023 through Sept. 2023	**383.80**

Schedule 3

Atlanta Gas Light Company
Calculation of Carrying Costs
on Balancing Adjustment
Environmental Response Cost
October 2022 - September 2023

Month	Monthly Amortization	Monthly Revenue	Monthly Balancing Adjustment (162-065 - 0000)	Cumulative Balancing Adjustment	Average Monthly Balance	Carrying Costs *	Cumulative Carrying Costs
Balance as reported from previous year	290,656,097.70	291,156,517.51		(10,969.82)			2,572.70
Adjustment	0.00	(35,951.12)		35,951.12			420.61
Balance adjusted to actual **	290,656,097.70	291,120,566.39		24,981.30			2,993.31
Amount Applied***			10,969.82	35,951.12		(2,572.70)	420.61
October	529,065.74	517,948.59	11,117.15	47,068.27	36,024.79	285.58	706.19
November	529,065.74	529,774.08	(708.34)	46,359.93	46,714.10	370.32	1,076.51
December	529,065.74	539,273.47	(10,207.73)	36,152.20	41,256.07	327.05	1,403.56
January 2023	529,449.54	542,021.47	(12,571.93)	23,580.28	29,866.24	232.61	1,636.17
February	529,449.54	544,384.16	(14,934.62)	8,645.66	16,112.97	125.49	1,761.66
March	529,449.54	543,836.71	(14,387.17)	(5,741.50)	1,452.08	11.31	1,772.97
April	529,449.54	543,545.81	(14,096.27)	(19,837.77)	(12,789.64)	(99.61)	1,673.36
May	529,449.54	537,672.70	(8,223.16)	(28,060.92)	(23,949.35)	(186.53)	1,486.83
June	529,449.54	526,669.55	2,779.99	(25,280.93)	(26,670.93)	(207.72)	1,279.11
July ****	529,449.54	526,669.55	2,779.99	(22,500.94)	(23,890.93)	(186.07)	1,093.04
August ****	529,449.54	526,669.55	2,779.99	(19,720.94)	(21,110.94)	(164.42)	928.62
September ****	529,449.59	526,669.55	2,780.04	(16,940.90)	(18,330.92)	(142.77)	785.85
TOTAL	$297,008,340.87	$297,525,701.58		($16,940.90)			$785.85

* After tax cost of capital - 7.1060% and revenue expansion factor - .747 from October 2022 to December 2022.
After tax cost of capital - 6.9815% and revenue expansion factor - .747 from January 2023 to present.

** Schedule 4 shows adjustment to prior year's carrying costs.

*** Amount applied in previous year's filing.

**** Estimated Revenues

Schedule 4

Atlanta Gas Light Company
Calculation of Carrying Costs
on Balancing Adjustment
Environmental Response Cost
October 2021 - September 2022

Month	Monthly Amortization	Monthly Revenue	Monthly Balancing Adjustment (162-065 - 0000)	Cumulative Balancing Adjustment	Average Monthly Balance	Carrying Costs *	Cumulative Carrying Costs
Balance as reported from previous year	284,300,633.34	284,790,083.33		(49,319.22)			441.65
Adjustment	0.00	(45,001.98)		45,001.98			557.00
Balance adjusted to actual	284,300,633.34	284,745,081.35		(4,317.23)			998.65
Amount Applied**			49,319.22	45,001.98		(441.65)	557.00
October	529,044.00	515,588.12	13,455.88	58,457.86	27,070.31	212.09	769.09
November	529,044.00	525,083.29	3,960.71	62,418.57	60,438.22	473.52	1,242.61
December	529,044.00	538,058.02	(9,014.02)	53,404.55	57,911.56	453.72	1,696.33
January 2022	529,814.71	540,126.66	(10,311.95)	43,092.60	48,248.58	382.48	2,078.81
February	529,814.71	541,956.13	(12,141.42)	30,951.18	37,021.89	293.48	2,372.29
March	529,814.71	543,372.29	(13,557.58)	17,393.59	24,172.39	191.62	2,563.91
April	529,814.71	542,155.19	(12,340.48)	5,053.11	11,223.35	88.97	2,652.88
May	529,814.71	535,871.79	(6,057.08)	(1,003.97)	2,024.57	16.05	2,668.93
June	529,814.71	526,365.63	3,449.08	2,445.10	720.56	5.71	2,674.64
July	529,814.71	523,067.40	6,747.31	9,192.41	5,818.76	46.13	2,720.77
August	529,814.71	521,714.40	8,100.31	17,292.72	13,242.56	104.98	2,825.75
September	529,814.71	522,126.12	7,688.59	24,981.30	21,137.01	167.56	2,993.31
TOTAL	$290,656,097.70	$291,120,566.39		$24,981.30			$2,993.31

* After tax cost of capital - 7.0231% and revenue expansion factor - .747 from October 2021 to December 2021.
After tax cost of capital - 7.1060% and revenue expansion factor - .747 from January 2022 to September 2022.

** Amount applied in previous year's filing.

Schedule 5

Atlanta Gas Light Company
Calculation of Carrying Cost on Third Party Recoveries - Ratepayer Portion
Received July 1, 2022 through June 30, 2023

Month	Date Received	Amount	Balance	Days Outstanding	Factor * (.069815/365 Days)/.747	Carrying Cost
Balance from previous year.			0.00			0.00
Amount applied in prior year's filing			0.00			0.00
Balance July			0.00	31	0.000256	0.00
August			0.00	31	0.000256	0.00
September			0.00	30	0.000256	0.00
October			0.00	31	0.000256	0.00
November			0.00	30	0.000256	0.00
December			0.00	31	0.000256	0.00
January			0.00	31	0.000256	0.00
February			0.00	28	0.000256	0.00
March			0.00	31	0.000256	0.00
April			0.00	30	0.000256	0.00
May			0.00	31	0.000256	0.00
June			0.00	30	0.000256	0.00
July			0.00	31	0.000256	0.00
August			0.00	31	0.000256	0.00
September			0.00	30	0.000256	0.00
Balance at 10/1/23			0.00			0.00

* After tax cost of capital - 6.9815% and revenue expansion factor - .747.

9. Environmental Response Cost (ERC) Recovery Rider (continued)

9.5 Current Rate

Effective October 1, 202~~3~~32, a rate of $2.18~~29~~ per Dt of DDDC per year shall be assessed based upon the terms of this Rider per year.

9. Environmental Response Cost (ERC) Recovery Rider (continued)

9.5 Current Rate

Effective October 1, 2023, a rate of $2.18 per Dt of DDDC per year shall be assessed based upon the terms of this Rider per year.